

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 4:23 CR 00197 MTS-RHH
)	
SHAWN JOSEPH SUMMERS)	
)	
Defendant.)	

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jennifer J. Roy, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with one count of manufacturing counterfeit currency, in violation of 18 USC §471 and four counts of passing counterfeit currency, in violation of 18 USC §472.
2. According to Warren County Sheriff's Department ("WCSD"), CN 23-00293SD, the defendant passed counterfeit currency on several occasions in the last two months. On March 2, 2023, the WCSD obtained a lawful search warrant for the defendant's residence in Marthasville, Missouri from the Circuit Court of Warren

County, Missouri. The search warrant was executed the same day. The WCSO recovered a quantity of counterfeit currency and materials used to make counterfeit currency. The WCSO also recovered materials used to manufacture methamphetamine. The defendant was advised of his constitutional rights pursuant to *Miranda v. Arizona*. The defendant advised that he understood his rights, waived his rights, and made a knowing and voluntary statement admitting to the production and passing of counterfeit currency. The defendant further admitted that he manufactured and smoked methamphetamine. The defendant stated that he cooked his methamphetamine “down the road” but refused to disclose an exact location. He stated that he only brings home the final product and discards everything else at an unknown location.

3. The defendant has a prior felony conviction for Possession of a Controlled Substance-Methamphetamine from St. Louis County, 18SL-CR07336. On February 15, 2019, the defendant was sentenced to 7 years’ imprisonment, the execution of the sentence was suspended, and he was placed on a term of probation for 2 years. The defendant has pending charges in Warren County, 23BB-CR00101, and is before this Court on a writ.
4. Pursuant to Title 18, United States Code, Section 3142(g), and upon consideration of the weight of the evidence against defendant; the defendant’s history and characteristics; and the nature and seriousness of the danger to any person or the community that would be posed by defendant’s release, defendant’s detention pending trial is warranted. The defendant admitted that he smokes and manufactures methamphetamine. The defendant denied manufacturing

methamphetamine in his home and refused to disclose the location of where he manufactures the methamphetamine, stating only that he cooked it “up the road.” He further advised that he disposed of the materials he used to manufacture the methamphetamine in some unknown manner and at some undisclosed location. The defendant’s production of methamphetamine either “up the road” or in his residence coupled with his admitted use of methamphetamine and history of drug abuse reflects that he poses a danger to the community.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant’s initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
UNITED STATES ATTORNEY

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